

IN THE UNITED STATES DISTRICT COURT  
FOR EASTERN DISTRICT OF LOUISIANA

VERONICA ALEXANDER  
PLAINTIFF

VS.

MEDICAL CITY OF PLANO, ET AL,  
DEFENDANTS

11-2407  
SECT. L MAG. 2

CIVIL ACTION NUMBER: \_\_\_\_\_

COMPLAINT BASED UPON PERSONAL INJURY.

1. THIS IS A CIVIL ACTION SEEKING DAMAGES AGAINST THE DEFENDANT FOR  
COMMITTING PERSONAL HARM AND INJURY IN AN UNSAFE MEDICAL  
ENVIRONMENT WHICH CONTRIBUTED TO MEDICAL MALPRACTICE AGAINST HER  
HUSBAND, CHARLES EDWARD JACKSON.
2. THE COURT HAS JURISDICTION SEVERE VIOLATIONS OF MEDICAL  
MALPRACTICE FOR NOT PROVIDING A SAFE MEDICAL ENVIRONMENT FOR  
HUSBAND CHARLES EDWARD JACKSON
3. THE PLAINTIFF, RESIDES AT:

VERONICA ALEXANDER  
1114 BRISTOL TRIAL  
DESOTO, TEXAS 75115

4. DEFENDANTS ARE NUMEROUS AND THEIR ADDRESSES ARE:

1  
TENDERED FOR FILING

COMPLAINT FOR FEDERAL COURT

SEP 23 2011  
U.S. DISTRICT COURT  
Eastern District of Louisiana  
Deputy Clerk

Fee Dpd  
 Process \_\_\_\_\_  
 Dktd \_\_\_\_\_  
 CtRmDep \_\_\_\_\_  
 Doc. No. \_\_\_\_\_

THE MEDICAL CITY OF PLANO  
3901 WEST 15<sup>TH</sup> IST  
PLANO, TEXAS 75075

5. DEFENDANTS AIG IS AN INSURANCE CONGLOMERATE AND A SUBSIDIARY AND THEIR ADDRESS IS:

*METHODIST RICHARDSON MEDICAL CENTER  
2321 EAST PRESIDENT GEORGE BUSH HWY  
RICHARDSON, TEXAS 75082*

6. DEFENDANT DR.NAIRA VABAIAN IS A MEDICAL DOCTOR AND THEIR ADDRESS IS:

*DR. NAIRA VABAIAN  
9128 W. PARKER RD-SUITE 1200  
PLANO, TEXAS 75093*

COUNT NUMBER 1

6. THE DEFENDANT IN AN ARBITRARY AND CAPRICIOUS WAY HAVE CONTRIBUTED TO THE PERSONAL INJURIES OF THE PLAINTIFF BY NOT PROVIDING A SAFE AND MEDICAL CARE ENVIRONMENT FOR HUSBAND CHARLES EDWARD JACKSON

COUNT NUMBER 2

7. THE DEFENDANT IS IN SERIOUS VIOLATIONS OF STATE AND FEDERAL LAWS CONCERNING MEDICAL MALPRACTICE.

COUNT NUMBER 3

8. THE DEFENDANT DELIBERATELY GROSS NEGLIGENCE IN NOT PROVIDING A

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**SAFE AND PROPER CARE MEDICAL ENVIRONMENT FOR HUSBAND CHARLES  
EDWARD JACKSON.**

**COUNT NUMBER 4**

**9. THE DEFENDANT TOOK ADVANTAGE OF THE PLAINTIFF BECAUSE IS BLACK AND  
REFUSED TO PROVED HIM AMPLE ASSISTANCE WITH HIS HEALTH INJURIES  
WHICH WERE A RESULT OF THERE GROSS NEGLIGENCE IN NOT PROVIDING A  
SAFE AND MEDICAL CARE ENVIRONMENT FOR HUSBAND CHARLES EDWARD  
JACKSON.**

**COUNT NUMBER 5**

**10. THE DEFENDANT HAS SHOWN THAT IT HAS NO INTENTIONS OF PROEPRLY  
TAKING CARE OF THE PLAINTIFF HUSBAND CHARLES EDWARD JACKSON AND HIS  
RELATED INJURIES AND HAVE CAUSED THE PLAINTIFF HUSBAND SEVERE MENTAL  
AND PHYSICAL STRESS IN THAT HER HUSBAND MAY NEVER BE ABLE TO PROPERLY  
WORK AGAIN.**

**TRIAL BY JURY :**

**JURY TRIAL REQUEST.**

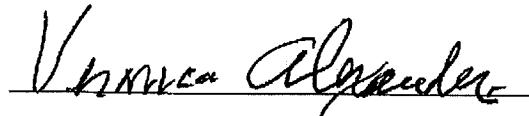
**RELIEF REQUESTED**

**PLAINTIFF SEEKS JUDGMENT AS FOLLOWS:**

**A. DAMAGES IN THE AMOUNT OF 50,000,000 FOR THE MENTAL STRESS AND**

**PHYSICAL PAIN WHICH THIS SITUATION HAS CAUSED HIM.**

**RESPECTFULLY SUBMITTED:**



VERONICA ALEXANDER, PRO SE

1114 BRISTOL TRAIL

DESOTO, TEXAS 75115

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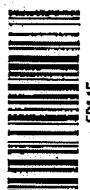
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